

PENNSYLVANIA
SCHOOL BOARDS
ASSOCIATION, INC.

774 LIMEKILN ROAD, NEW CUMBERLAND, PA 17070-2398 / (717) 774-2331 / FAX (717) 774-0718

January 6, 1997

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JAN 10 1997

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D. C. 20554

RE: CC Docket No. 96-45

Dear Chairman Hundt:

On behalf of the Pennsylvania School Boards Association, I would like to commend you, the FCC, and the Federal-State Joint Board for the initial recommendations issued for the Telecommunications Act of 1996 pertaining to discounts for schools and libraries.

We are particularly pleased with the deep discounts, as well as the latitude in allowing districts decide which services will best meet the needs of their districts. While we have some concern with using the School Lunch program for determining a district's wealth, we understand that there no national standard for wealth now exists.

PSBA strongly supports the initial recommendations and urges the FCC to approve their adoption. If we may be of any assistance to you on this issue, please do not hesitate to call.

Sincerely,

Thomas J. Gentzel
Assistant Executive Director
for Governmental and Member Relations

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Appleton Area School District

120 E. Harris Street • P.O. Box 2019 • Appleton, WI 54913-2019 • 414-832-6161

Fax: 414-832-1725

December 20, 1996

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

RE: CC Docket No. 96-45

Dear Chairman Hundt:

I serve on the Board of Education for the Appleton Area School District. Thank you for your leadership and the leadership of the Joint Board for their strong decision to ensure that all schools will have affordable access to the Information Superhighway. Please fully adopt the recommendations of the Joint Board.

These recommendations will ensure that all schools in our district have affordable access to technology. The plan is also flexible and will empower schools to select the services that work best for their students and families. The inclusion of discounts on internal connections and Internet access is equally vital. This will bring service directly to the classroom where students and families can learn.

It is important that Internet discounts are available. In our district, we provide technology for students who, in many cases, do not have computers in their homes. We need to be sure schools can afford this since so many families in our community can not.

I urge you to adopt the complete recommendations as a way to ensure success for students moving into the technological demands of the 21st century.

Sincerely,

Donald Hietpas
Board of Education

smf

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Appleton Area School District

120 E. Harris Street • P.O. Box 2019 • Appleton, WI 54913-2019 • 414-832-6161

Fax: 414-832-1725

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

RE: CC Docket No. 96-45

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It is important that Internet discounts are available. In our district, we provide technology for students who, in many cases, do not have computers in their homes. We need to be sure schools can afford this since so many families in our community can not.

I urge you to adopt the complete recommendations as a way to ensure success for students moving into the technological demands of the 21st century.

Sincerely,

Richard Pike

CC96-45

Elizabeth M. Visser
405 Saltaire Way
Mattituck, NY 11952



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JAN 10 1997

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January 3, 1997

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Reed Hundt, Chairman
Federal Communications Commission
1919 M St, NW, Room 814
Washington, DC 20554

Re: "November 7, 1996 Recommended Decision of the Federal-State Joint Board on Universal Service."

Dear Chairman Hundt:

The Federal-State Joint Board's recommendations on Universal Service represent the dedication of people who understand how vital enhanced technological support is to students across the country.

The students in the fifty-three Long Island school districts that are served by the Eastern Suffolk Board of Cooperative Educational Services (BOCES) are the beneficiaries of your decisions.

Thank you for your hard work on behalf of our students.

Sincerely,

Elizabeth M. Visser, Trustee
Eastern Suffolk Board of Cooperative Educational Services
516 298-9363

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DENVER PUBLIC SCHOOLS · BOARD OF EDUCATION

School District Number One in the City and County of Denver and State of Colorado
900 Grant Street · Denver, Colorado 80203 · Telephone (303) 764-3210

December 30, 1996

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JAN 10 1997

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., room 814
Washington, D.C. 20554

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RE: CC DOCKET NO. 96-45

Dear Chairman Hundt:

I am a school board member from the Denver Public Schools and I would like to thank you for your leadership, and the leadership of the Joint Board, for their strong decision to ensure that all schools will have affordable access to the Information Superhighway. I urge the FCC to fully adopt the recommendations of the Joint Board.

The discount range of 20 to 90 percent will ensure that all schools--even the poorest--have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. The inclusion of discounts on internal connections and Internet access is equally vital and stands to bring services directly to the classroom where students learn.

As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21st century learning to our school children.

Sincerely,

Lynn D. Coleman
Vice-President
Board of Education

LDC/jl

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**Elizabeth M. Visser, Trustee
Eastern Suffolk Board of Cooperative
Educational Services**

**405 Saltaire Way 516-298-9363
Mattituck, NY 11952**

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Jan. 4, 1997

JAN 10 1997

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**The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554**

Re: CC Docket No: 96-46

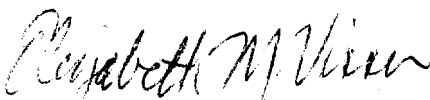
Dear Chairman Hundt:

Eastern Suffolk Board of Cooperative Educational Services (BOCES) serves the shared educational needs of fifty-three school districts on Long Island. As a Trustee of this agency that provides technological services, support, and education for tens of thousands of students, I am very pleased with the recommendations that have been made to the Federal Communications Committee by the Federal-State Joint Board as outlined in the document entitled, "November 7, 1996 Recommended Decision of the Federal-State Joint Board on Universal Service."

I am writing to include my support for the "education rate." To assure the discounted rate to schools will mean that all students will enjoy the advantages provided by the level of technology needed in all classrooms.

This is an extraordinary opportunity for you to approve measures that will unquestionably enhance the learning experience of students throughout the Eastern Suffolk BOCES region. Thank you for your support for our students.

Sincerely,


Elizabeth M. Visser

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PINE-RICHLAND SCHOOL DISTRICT

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December 31, 1996

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JAN 10 1997

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554

RE: CC Docket No. 96-45

Dear Chairman Hundt:

I am a school board member from Pine-Richland School District, Gibsonia, Pennsylvania, and I would like to thank you for your leadership and the leadership of the Joint Board for their strong decision to ensure that all schools will have affordable access to the Information Superhighway. I urge the FCC to fully adopt the recommendations of the Joint Board.

The discount range of 20 to 90 percent will ensure that all schools—even the poorest—have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. The inclusion of discounts on internal connections and Internet access is equally vital and stands to bring services directly to the classroom where students learn.

As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21st century learning to our schoolchildren.

Sincerely,

PINE-RICHLAND SCHOOL BOARD

Lawrence Bridge
School Director

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Chatham County Schools

P. O. Box 128
369 West Street

Pittsboro, North Carolina 27312-0128

(919) 542-3626

FAX (919) 542-1380

Larry G. Mabe, Ed. D.
Superintendent

Betty T. Atkinson, Ed. D.
Associate Superintendent

Paul G. Joyce
Assistant Superintendent

Linda C. Warfford
Assistant Superintendent

Board of Education

Robert J. Wilkie, Chm.
Rt. 1, Goldston

Gaynelle Armour
Drawer H, Siler City

Cadle Cooper
Rt. 4 Box 143, Pittsboro

Ernest H. Dark, Jr.
Box 512, Pittsboro

Susan Helmer
410 Dowd St., Siler City

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January 3, 1997

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Re: CC Docket No. 96-45

Dear Chairman Hundt:

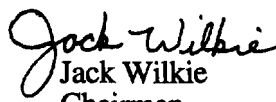
I am a school board member from Chatham County Schools, and I would like to thank you for your leadership and the leadership of the Joint Board for their strong decision to ensure that all schools will have affordable access to the Information Superhighway. I urge the FCC to fully adopt the recommendations of the Joint Board.

The discount range of 20 to 90 percent will ensure that all schools--even the poorest--have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. The inclusion of discounts on internal connections and Internet access is especially vital and stands to bring services directly to the classroom where students learn.

These discounts would make it much more affordable for all our schools in Chatham County to obtain such services as Internet access for our students and teachers as well as other opportunities for all our school children.

As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21st century learning to our schoolchildren.

Sincerely,


Jack Wilkie
Chairman
Board of Education

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**Communications
Workers of America**
AFL-CIO, CLC

501 Third Street, N.W.
Washington, D.C. 20001-2797
202/434-1100 Fax 202/434-1279

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DOCKET FILE COPY ORIGINAL

January 7, 1997

Mr. John S. Morabito
Deputy Chief, Accounting and Audits Division
Common Carrier Bureau
Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20554

Re: CC Docket 96-45. Federal-State Joint Board on Universal Service: Questions to be Posed to Model Proponents at Staff Workshops on Proxy Cost Models on January 14-15, 1997.

Dear Mr. Morabito:

On December 12, 1996, the Commission released a Public Notice announcing staff workshops on the various proxy cost models that have been developed to determine high cost support for universal service. The Notice included a set of questions to be answered by model proponents and sought comment on these questions.

The Communications Workers of America (CWA) appreciates the opportunity to comment on these questions. CWA represents more than 500,000 employees working in the telecommunications industry.

CWA encourages Commission staff to ask model proponents to make explicit the labor cost assumptions in their models. It would appear that the proxy models include labor costs in the modeling of operating and support expenses. Among the expenses that include significant labor cost components are repair and maintenance; retail costs--the cost of bill production, billing inquiries, and sales; and marketing and customer operations.

CWA believes that historical (e.g. actual) cost is the appropriate method on which to model labor expense in the local exchange. Any proxy cost model which does not base labor expenses on historical cost in the local exchange would serve to undermine legally binding collective bargaining agreements and existing labor standards. Collective bargaining agreements cover almost the entire non-managerial workforce of incumbent local exchange carriers, including

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employees at the seven RBOCs, GTE, the local Sprint companies, and most of the independent companies.

Certainly, it is not the intent of the Commission in this proceeding to undermine industry labor standards. Therefore, modeling operating and support expenses based on historical (actual) cost in the local exchange industry is the most appropriate method.

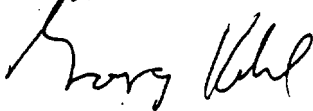
Commission staff should ask model proponents to explain whether the cost of labor in the model is based on historical (actual) costs in the local exchange industry. If not, what is the justification for an alternate assumption? What inflation and price input factors are built into the model? How are obligations that will be paid in the future such as retiree health benefits ("OPEBs") incorporated into the models?

In addition, Commission staff should ask model proponents to explain whether there is a possible modeling error built into the calculation for repair, maintenance, and retail costs. You write in your letter (Question 13) which was attached to the Public Notice: "All of the models appear to base repair, maintenance, and retail costs on historical cost. In some cases this is done based on a historical relationship between investment and expenses as reported in ARMIS." Because this method calculates repair, maintenance, and retail costs by applying the expense to investment ratio to the cost of network investment, any error in the modeling of network investment will also result in errors in the modeling of repair, maintenance, and retail costs.

Finally, question 16 in your letter notes that the Hatfield model calculates non-plant related expenses such as marketing and customer operations with a 10% overhead figure. What is the basis of this figure? What are the labor cost assumptions in this figure? Is this consistent with labor standards in the local exchange industry?

We encourage Commission staff to raise these questions regarding labor cost assumptions in the models at the January 14 and 15 workshops.

Sincerely,

A handwritten signature in cursive script, appearing to read "George Kohl".

George Kohl, Admin. Asst. to the President
Director of Research and Development